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10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION  
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13 CHASOM BROWN, *et al.*,

14 Plaintiffs,

15 v.

16 GOOGLE LLC,

17 Defendant.  
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Case No. 5:20-cv-03664-LHK-SVK

**STIPULATION AND ~~PROPOSED~~  
ORDER SETTING BRIEFING  
SCHEDULE FOR DISCOVERY  
DISPUTES**

**AS MODIFIED BY THE COURT**

Judge: Honorable Susan van Keulen

Pursuant to Civil Local Rules 7-11 and 7-12, Plaintiffs and Defendant Google LLC jointly request entry of an order scheduling briefing regarding discovery disputes on which the parties have reached impasse. The Parties stipulate as follows:

WHEREAS, the Parties conferred on Plaintiffs' requests to take apex depositions of Alphabet and Google's Chief Executive Officer Sundar Pichai and Chief Marketing Officer Lorraine Twohill, which Google opposes, and have reached impasse; and

WHEREAS, the Parties seek the Court's guidance on its preferred method for briefing these two discovery disputes; and

WHEREAS, the Parties are continuing to meet and confer regarding disputes related to Google's responses to Plaintiffs' Interrogatory Nos. 8 and 11-17; and

WHEREAS, the Parties seek the Court's guidance on its preferred method for briefing this discovery dispute in the event of impasse following continued meet and confer negotiations; and

NOW, THEREFORE, the Parties stipulate to the following briefing schedule for these disputes:

1. The Parties are to file a single, joint letter brief not to exceed five pages regarding the apex deposition of Ms. Lorraine Twohill at 8:30 p.m. Pacific Time on December 15, 2021, with an option for both Parties to stipulate to a slightly later filing, if necessary.
2. The Parties are to file a single, joint letter brief not to exceed five pages regarding the apex deposition of Mr. Sundar Pichai at 5:30 p.m. Pacific Time on December 17, 2021, with an option for both Parties to stipulate to a slightly later filing, if necessary.
3. The Parties are to continue meeting and conferring regarding Google's responses to Plaintiffs' Interrogatory Nos. 8 and 11-17. If the Parties are unable to reach a resolution, the Parties may file a single, joint letter brief not to exceed five pages.

DATED: December 14, 2021

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/s/ Mark C. Mao

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*Attorneys for Plaintiffs*

**ATTESTATION OF CONCURRENCE**

I am the ECF user whose ID and password are being used to file this STIPULATION AND [PROPOSED] ORDER SETTING BRIEFING SCHEDULE FOR DISCOVERY DISPUTES. I hereby attest that each of the signatories identified above has concurred in the filing of this document.

Dated: December 14, 2021

By /s/ Andrew H. Schapiro  
Andrew H. Schapiro  
*Counsel on behalf of Google*

**~~[PROPOSED]~~ ORDER**

Pursuant to stipulation of the Parties, the Court hereby ORDERS:

The parties are to submit briefing according to the following schedule:

1. The Parties are to file a single, joint letter brief not to exceed five pages regarding the apex deposition of Ms. Lorraine Twohill ~~at 8:30 p.m. Pacific Time on December 15, 2021, with an option for both Parties to stipulate to a slightly later filing, if necessary.~~  
<sup>16</sup>
2. The Parties are to file a single, joint letter brief not to exceed five pages regarding the apex deposition of Mr. Sundar Pichai ~~at 5:30 p.m. Pacific Time on December 17, 2021, with an option for both Parties to stipulate to a slightly later filing, if necessary.~~
3. The Parties are to continue meeting and conferring regarding Google's responses to Plaintiffs' Interrogatory Nos. 8 and 11-17. If the Parties are unable to reach a resolution, the Parties may file a single, joint letter brief not to exceed five pages.

**PURSUANT TO THE STIPULATION, IT IS SO ORDERED.**

DATED: December 15, 2021

  
HON. SUSAN VAN KEULEN  
United States Magistrate Judge